

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JEANETTE HALL	§	
Plaintiff	§	
	§	
vs.	§	NO. 4:12-cv-03102
	§	
ATRIA MANAGEMENT COMPANY, LLC	§	
Defendant	§	

INITIAL DISCLOSURES OF PLAINTIFF, JEANETTE HALL

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Jeanette Hall, and hereby makes this initial disclosure under Rule 26(a)(1)(A), Federal Rules of Civil Procedure, as follows:

(A), Federal Rules of Civil Procedure, as follows:

i. The name and, if known the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claim or defenses, unless the use would be solely for impeachment:

Jeanette Hall
c/o R. Nicole Stagg, Attorney at Law
Darryl Scott, Attorney at Law
1314 Texas Avenue, Suite 701
Houston, Texas 77002
Tel: 713-223-5811
Fax: 713-223-1416

ii. A copy – a description by category and location - of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may be used to support its claims or defenses, unless the use would be solely for impeachment.

All documents are held by:

Jeanette Hall
c/o R. Nicole Stagg, Attorney at Law
Darryl Scott, Attorney at Law
1314 Texas Avenue, Suite 701

Houston, Texas 77002
Tel: 713-223-5811
Fax: 713-223-1416

iii. A computation of each category of damages claimed by the disclosing party – who must make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Computations for damages have not been determined.

iv. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

No insurance agreement required under this rule is applicable in this case.

RESPECTFULLY SUBMITTED,



R. Nicole Stagg
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s/Darryl E. Scott/
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Attorney for Plaintiff, Jeanette Hall

CERTIFICATE OF SERVICE

I hereby certify (1) that the above instrument INITIAL DISCLOSURES OF PLAINTIFF, JEANETTE HALL is being filed electronically, with confirmation to be received that the Electronic Court Filing ("ECF") system has registered such transaction, and with a listing of all attorneys who have received notice of electronic filing of the above instrument, and (2) that the above instrument is being sent by certified mail, return receipt requested, to all known counsel of record, or parties appearing pro se, who are not listed as having received such notice of electronic filing of the above instrument; and that both such actions are being done of this, 31st day of January, 2013.



R. Nicole Stagg

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-and-

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